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January 10, 2011

BY HAND DELIVERY

Mr. Christopher Hughey
Acting General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

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2011 JAN 10 PM 5:11
OFFICE OF GENERAL
COUNSEL

Re: Matter Under Review 6417

Dear Mr. Hughey:

We write on behalf of our clients Jim Huffman for Senate (the "Committee"), Lisa Lisker, as Treasurer, James Huffman, and Leslie Spencer, in response to the complaint filed in the above-captioned matter under review. The complaint alleges that James Huffman, as a candidate for United States Senate, did not have sufficient funds to make the personal loans to his campaign that were reported by the Committee.

Mr. Huffman and his wife, Leslie Spencer, intended those loans to be made by Mr. Huffman. Based on their misunderstanding of the Commission's somewhat arcane and counter-intuitive rules for the use of marital property, however, several of the loans technically should have been attributed to Ms. Spencer. The Committee is amending its FEC disclosure reports to show the loans as having been made by Ms. Spencer, and Mr. Huffman is now liquidating personal funds in order to enable the Committee to refund the loans to Ms. Spencer.

In light of the complete absence of any intent to violate the Commission's rules, and the peculiarity of the rules applicable to marital property, the Commission should exercise its discretion to dismiss the complaint with no further action.

I. Factual Background

On March 3, 2010, James L. Huffman filed a Statement of Candidacy with the FEC for the office of United States Senator from Oregon. Desi. of James L. Huffman ¶ 2 (Exh. 1). On the same day, the Committee filed its Statement of Organization with the FEC, naming Todd R.

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Stucky as Treasurer. The Committee amended its Statement of Organization on March 22, 2010, replacing Mr. Stucky with Lisa Liaker. This was Mr. Huffman's first candidacy for federal office.¹ Mr. Huffman was defeated in the November 2, 2010, general election. See *id.* ¶¶ 3-5.

As part of his fundraising efforts, Mr. Huffman understood that a candidate is permitted to make personal loans to his campaign Committee, and he sought to do so beginning in February 2010. See *id.* ¶ 6.

A. Loan history

Mr. Huffman and Ms. Spencer estimated Mr. Huffman's net worth, exclusive of Ms. Spencer's share of jointly-held property, to be approximately \$2.3 million. See *id.* ¶ 7; Decl. of Leslie Spencer ¶ 5 (Exh. 2). This number was calculated by taking an informal inventory of the value of the couple's jointly owned homes in Oregon and Montana, a parcel of land in Montana, Mr. Huffman's TIAA-CREF retirement account, and stock owned by Mr. Huffman. See Huffman Decl. ¶ 7; Spencer Decl. ¶ 5. At the time the loans described below were made to the Committee, Mr. Huffman and Ms. Spencer's understanding of the FEC's rules related to personal loans was that the total amount of Mr. Huffman's loans could not exceed their \$2.3 million estimate of Mr. Huffman's share of jointly owned property. See Huffman Decl. ¶ 6; Spencer Decl. ¶ 4. The couple proceeded based on that understanding.

Loan 1: On February 25, 2010, Mr. Huffman and Ms. Spencer transferred \$50,000 from a pre-existing home equity line of credit account at Bank of the West in Portland, Oregon, to a joint checking account at the same institution. See Huffman Decl. ¶ 11; see also Exh. 4. The home equity line of credit was established on January 13, 2003, and was secured by the couple's jointly owned primary home in Oregon. See Huffman Decl. ¶ 8; Spencer Decl. ¶ 6. Also on February 25, a check was written from the joint checking account for \$50,000, made payable to Jim Huffman for Senate and deposited into the campaign account. See Huffman Decl. ¶ 11; see also Exh. 4. Mr. Huffman intended this payment to be a personal loan to the Committee. Huffman Decl. ¶ 12.

Loan 2: In March 2010, Mr. Huffman and Ms. Spencer discussed the possibility of making additional personal loans from Mr. Huffman to the Committee. The couple evaluated their existing assets and decided to use funds from a trust account at Fiduciary Trust Company International ("FTCI"). See Huffman Decl. ¶ 9; Spencer Decl. ¶ 7. Even though this account is in Ms. Spencer's name alone, the couple had a long history of treating the funds in this account

¹ Mr. Huffman's only prior candidacy for any office was an unsuccessful bid for the Montana Constitutional Convention in 1971. For that 1971 campaign, Mr. Huffman did not have a campaign committee or staff and his campaign consisted of door-to-door solicitations. See Huffman Decl. ¶ 4.

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as joint funds for family use. See Huffman Decl. ¶ 10; Spencer Decl. ¶ 8. Records indicate multiple transfers in the past several years from FTCI to the couple's joint checking account at Bank of the West. See Exh. 5. These funds were used for family projects, such as home renovations, car purchases, and family travel. Spencer Decl. ¶ 8.

On March 15, 2010, \$50,000 was wired from FTCI to the couple's joint account at Bank of the West. See Huffman Decl. ¶ 11; see also Exh. 4. Because FTCI had an existing secure transfer history with the couple's joint checking account at Bank of the West, it was most efficient to transfer funds from cash-on-hand at FTCI to the joint Bank of the West account. Spencer Decl. ¶ 7. Having funds in the joint account also provided maximum flexibility to make a personal loan to the Committee, in the amount and at the time that was most appropriate. See *id.* On March 24, 2010, a check was written for \$50,000, made payable to Jim Huffman for Senate, and sent in a regularly scheduled delivery to Ms. Lisker as Treasurer. See Huffman Decl. ¶ 11; see also Exh. 4. Mr. Huffman intended this payment to be a personal loan to the Committee, and considered it within the total amount estimated to be his share of jointly owned assets. Huffman Decl. ¶ 12.

Loan 3: On April 8, 2010, \$150,000 was wired from FTCI to the Bank of the West joint account. See Huffman Decl. ¶ 11; see also Exh. 4. On March 31, a check was written for \$150,000, made payable to Jim Huffman for Senate, and sent in a regularly scheduled delivery to Ms. Lisker. See Huffman Decl. ¶ 11; see also Exh. 4. Mr. Huffman intended this payment to be a personal loan to the Committee, and considered it within the total amount estimated to be his share of jointly owned assets. Huffman Decl. ¶ 12.

Loan 4: On July 1, 2010, \$250,000 was wired from FTCI to the Bank of the West joint account. See Huffman Decl. ¶ 11; see also Exh. 4. On June 30, a check was written for \$200,000, made payable to Jim Huffman for Senate and sent in a regularly scheduled delivery to Ms. Lisker. See Huffman Decl. ¶ 11; see also Exh. 4. Mr. Huffman intended this payment to be a personal loan to the Committee, and considered it within the total amount estimated to be his share of jointly owned assets. Huffman Decl. ¶ 12.

Loan 5: On August 25, 2010, Ms. Spencer obtained a \$600,000 line of credit at FTCI, secured against the assets in the FTCI trust account. See Exh. 6. On September 13, \$500,000 was wired from the FTCI line of credit to the Bank of the West joint account. See Huffman Decl. ¶ 11; see also Exh. 4. On September 14, \$500,000 was wired to the Jim Huffman for Senate campaign account at Wachovia Bank NA of Virginia. See Huffman Decl. ¶ 11; see also Exh. 4, 7. Mr. Huffman intended this payment to be a personal loan to the Committee, and considered it within the total amount estimated to be his share of jointly owned assets. Huffman Decl. ¶ 12.

Loan 6: On October 4, 2010, Ms. Spencer increased the FTCI line of credit to \$900,000. See Exh. 8. On October 13, \$400,000 was wired directly from the FTCI line of credit to the Jim Huffman for Senate campaign account at Wachovia Bank. See Huffman Decl. ¶ 11; see also

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Exh. 7. The direct transfer to the Committee account, rather than to the Bank of the West joint account, was made to facilitate the timing of a planned Committee advertisement. Spencer Decl. ¶ 7. Mr. Huffman intended this payment to be a personal loan to the Committee, and considered it within the total amount estimated to be his share of jointly owned assets. Huffman Decl. ¶ 12.

Mr. Huffman and Ms. Spencer did not appreciate the need to focus on whether, for each particular loan, the source of funds was an account owned exclusively by Mr. Huffman or in which he had a sufficient interest to cover the amount of the loan. Rather, in each instance, Mr. Huffman and Ms. Spencer mistakenly focused on making loans from family funds not to exceed what they reasonably believed to be Mr. Huffman's overall personal net worth.

B. Campaign Reports

Mr. Huffman and Ms. Spencer conveyed to Ms. Lisker that each of the loans discussed above was a personal loan from Mr. Huffman to the Committee. Huffman Decl. ¶ 13; Spencer Decl. ¶ 9; Lisker Decl. ¶ 3. Ms. Lisker explained to Ms. Spencer that personal loans from the candidate can derive from joint assets, but must not exceed the candidate's share of those assets. Spencer Decl. ¶ 9; Lisker Decl. ¶ 4. Ms. Spencer told Ms. Lisker that the total amounts were within Mr. Huffman's share of the couple's jointly held assets. Spencer Decl. ¶ 9; Lisker Decl. ¶ 4.

As noted above, Mr. Huffman and Ms. Spencer had a good faith understanding that the total of these loans were within Mr. Huffman's estimated share of the couple's joint assets. Ms. Lisker was not aware of the nature of the accounts where the funds for these loans originated. Lisker Decl. ¶ 4. Based on her understanding of the rules, Ms. Spencer did not believe the account originating the funds was required to be reported to Ms. Lisker. Spencer Decl. ¶ 9.

Based on her understanding from Mr. Huffman and Ms. Spencer that these loans were personal loans from the candidate, Ms. Lisker reported those loans to the FEC as personal loans from Mr. Huffman to the Committee. Lisker Decl. ¶ 5.

C. Remedial Measures

On October 27, 2010, Jeff Mapes, a reporter for *The Oregonian*, called Mr. Huffman to discuss issues related to Mr. Huffman's loans to the Committee. Later that day, Mr. Mapes published a blog entry on *The Oregonian*'s website raising questions about the legality of the loans.² This was the first that Mr. Huffman or Ms. Spencer became aware of any potential issues with these loans. See Huffman Decl. ¶ 14; Spencer Decl. ¶ 10.

² http://blog.oregonlive.com/mapesonpolitics/2010/10/huffman_raises_questions_by_lo.html

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They immediately alerted Ms. Lisker and made efforts to retain federal election law counsel. Prior to this time, the Committee did not have the benefit of advice from counsel with federal election law expertise. Huffman Decl. ¶ 14; Spencer Decl. ¶ 10. After a review of the various loan transactions and associated FEC reports, the Committee filed its post-general report disclosing that the final five loans had been made by Leslie Spencer. The Committee will be filing amendments to past reports to reflect what was disclosed in the post-general report. Mr. Huffman also sought to finance a personal contribution to the Committee, this time using only assets he owned outright, or his share of particular jointly owned assets, to enable the Committee to make a refund to Mr. Spencer.

After consultation with counsel and Ms. Lisker as Treasurer, on December 1, 2010, Mr. Huffman and Ms. Spencer obtained two home equity lines of credit from Franklin Templeton Bank & Trust in Salt Lake City, Utah. See Exh. 9; Exh. 10. The first line of credit was secured against the couple's jointly owned property in Oregon, which was professionally appraised at \$1,000,000. See Exh. 11. The second line of credit was secured against the couple's jointly owned property in Montana, which was professionally appraised at \$860,000. See Exh. 12. The total equity in these homes is \$1,674,541.21.³ See Huffman Decl. ¶ 15. Therefore, Mr. Huffman's interest in the value of these properties is \$837,270.61. The value of Mr. Huffman's personal stock holdings is \$81,340.57,⁴ and his TIAA-CREF retirement fund is worth \$879,715.51.⁵ See Huffman Decl. ¶ 16; Exh. 13, 14.

Mr. Huffman is making a \$967,270.61 contribution to Jim Huffman for Senate with the purpose of allowing the Committee to refund loans derived from the FTCL account. See Huffman Decl. ¶ 17. This contribution is comprised of \$787,270.61⁶ from Mr. Huffman's interest in the value of the couple's two homes, \$80,000 from the sale of Mr. Huffman's stock, and \$100,000 from his TIAA-CREF account. *Id.* Using the funds from Mr. Huffman's

³ The current debt owed on the Oregon home includes the \$50,000 drawn from a home equity line for Loan 1. This \$50,000 was not considered when calculating the total equity shown here, in order to present a clear picture of how much Mr. Huffman's share was to make all loans to the committee, including Loan 1.

⁴ Value as sold on December 17, 2010, less commission on sale.

⁵ The difference between the couple's informal estimate of Mr. Huffman's assets and the final numbers is due to a good faith belief that the real market value of their joint homes was significantly higher than what they have since been appraised for. In addition, the couple did not understand that the parcel of land in Montana that Mr. Huffman purchased could not be considered part of his total assets because he had placed the land in Ms. Spencer's name after they were married.

⁶ Because \$10,000 had already been loaned to the committee against the Oregon home, \$787,270.61 was still available for this contribution.

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contribution, as well as cash-on-hand in the Committee's bank account, the Committee will refund \$1 million to Mr. Spencer. *Id.* Efforts are in process to obtain additional funds from Mr. Huffman's assets, and Mr. Huffman expects to be able to finance a full refund to Mr. Spencer by May when additional retirement funds should become available to him. *Id.*

II. Analysis

Mr. Huffman and Ms. Spencer intended that each of the loans made to the Committee be personal loans from the candidate. Based on accurate advice from Ms. Lisker, the couple understood that a candidate's personal loans to the Committee from joint assets could not exceed the candidate's share of those assets. The couple operated under a good faith belief that as long as Mr. Huffman's personal loans did not exceed his total share in the couple's joint assets, the personal loans were permissible regardless of the specific origin of the funds.

Mr. Huffman and Ms. Spencer had an incomplete understanding of the relatively complex regulations related to the source of assets backing personal loans to an authorized committee. The decisions that were made with respect to the source of loans were based solely on convenience and flexibility. At no point did any of the Respondents have a motive or an intent to violate FEC regulations, as demonstrated below.

A. Ms. Spencer understood that her contributions to the Committee were limited

Ms. Spencer understood that her individual contributions to the Committee were limited to \$2400 per election. On March 31, 2010, she wrote a \$4,800 check to the Committee, which comprised a \$2,400 contribution to the 2010 primary election, and a \$2,400 contribution to the general election. Spencer Decl. ¶ 3. FEC reports reflect that the Committee received these contributions on March 31, 2010. See Exh. 15. At the time of the remaining transactions from the couple's accounts, she had a good faith belief that the payments were personal loans from Mr. Huffman. At no point did Ms. Spencer intend to make individual contributions to the Committee beyond the allowable limit.

B. Mr. Huffman and Ms. Spencer acted pursuant to a good faith belief that these loans were permissible personal loans from Mr. Huffman

The decision by Mr. Huffman and Ms. Spencer to use funds derived from the FTCI account rather than Mr. Huffman's individual or joint assets was primarily a pragmatic decision. Operating under the belief that a personal loan within the total amount of Mr. Huffman's share of assets was permissible regardless of the specific source of the loan, the couple looked for the most convenient and accessible source of funds. As discussed in more detail below, the couple had a long practice of transferring funds from FTCI to their joint account at Bank of the West for use in family projects and activities. Reasons of this account transfer history between the two accounts, obtaining funds from FTCI—either from cash on hand or from a line of credit—was quicker and more convenient than obtaining loans secured by jointly owned real property.

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The couple did not realize at the time that the specific source of the funds had an impact on the permissibility of the loans.

C. Mr. Huffman and Ms. Spencer have a history of treating the FTCI trust funds as joint funds

In addition to the practical reasons for using funds derived from FTCI rather than jointly owned real property, Mr. Huffman and Ms. Spencer have an established practice of using FTCI funds for family projects. The couple considers the funds in the trust account as funds available for their joint or individual use, and have never made distinctions in its use based on the ownership details. Since they have been married, Mr. Huffman and Ms. Spencer have transferred funds from FTCI to their joint checking account at Bank of the West on numerous occasions to use for family purposes, such as home renovations, car purchases, and family travel. The couple also uses the FTCI account to pay federal and state taxes from their joint returns, as well as to deposit joint tax refunds. The couple does not treat the money in this account any differently than money in their joint accounts.

Ms. Spencer is the income beneficiary to a separate trust account at FTCI. This trust regularly deposits funds in the couple's joint checking account at Bank of the West. While these funds are not involved in the current matter, and no loans to the Committee were derived from these funds, the regular transfer of trust funds to the joint checking account demonstrates the couple's longstanding practice of treating trust funds as joint funds.

This long-held understanding of the joint use of the funds in the FTCI account is an additional reason that Mr. Huffman and Ms. Spencer did not believe that the use of these funds—rather than others that were in fact available to Mr. Huffman—would be distinguished under FEC regulations. The couple understood that only Ms. Spencer had access to the FTCI account, and did not consider these funds when estimating Mr. Huffman's net worth, but believed that they could both use the funds as they had many times in the past. Based on their understanding of the personal loan rules, the couple's sole focus was on ensuring that the use of funds did not exceed their estimate of Mr. Huffman's total assets, including his share of joint assets, without regard to the sources of funds.

D. Respondents have taken appropriate remedial steps

On its post-general report to the FEC, the Committee disclosed that the final five loans were made by Leslie Spencer. In addition, Mr. Huffman is contributing sufficient funds to the Committee to enable an initial, substantial refund to Ms. Spencer, and he currently expects to be able to finance a full refund by May. The Commission should give appropriate weight to Respondents' efforts to take timely remedial action.

Moreover, Respondents respectfully urge the Commission to take into account the fact that Mr. Huffman and Ms. Spencer were new to the political process and were attempting to

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comprehend the joint asset rules without the benefit of election law counsel. The Commission's rules governing the use of marital property by a federal candidate are counter-intuitive at best, especially in circumstances such as those where a married couple as a practical matter treats the spouse's assets as common property in all aspects of their lives.⁷

In the circumstances presented here, the Commission should exercise its discretion to close this matter under review without further action.

Respectfully Submitted,



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*Attorneys for Jim Huffman for Senate,
Lisa Lisker, Treasurer, Mr. James
Huffman, and Ms. Leslie Spencer*

Enclosures

⁷ There is a serious question as to whether, in the circumstances presented here, restrictions on the use of a married couple's assets for contributions to an authorized committee are constitutional, given that there is no reasonable argument that the spouse's contributions could be corrupting. While the Supreme Court in *Buckley v. Valeo*, 424 U.S. 1 (1976), upheld contribution limits for family members, the Court noted that the risk of corruption was "somewhat diminished" in connection with a family member's contribution. *Id.* at 53 n.59. The risk of corruption is essentially zero in the circumstances presented here, where the spousal contribution is derived from funds routinely shared by the candidate and his spouse. Respondents reserve the right to object to the complaint on constitutional grounds, but respectfully submit that the complaint should be dismissed on prudential grounds, regardless of the constitutional merits.

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cc: **Cynthia L. Bauerly, Chair**
 Caroline C. Hunter, Vice Chair
 Donald F. McGahn II, Commissioner
 Matthew S. Petersen, Commissioner
 Steven T. Walther, Commissioner
 Ellen L. Weintraub, Commissioner

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NAME OF COMMITTEE (in full)
JIM HUFFMAN FOR SENATE

A.

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FEC ID number of contributing
federal political committee.

C

Name of Employer
Yale University

Occupation
President

Receipt For: **2010**
☐ Primary ☒ General
☐ Other (specify) **✓**

Election Cycle-to-Date **✓**

2400.00

Date of Receipt

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Transaction ID: **SA11AL4127**

Amount of Each Receipt this Period

2400.00

Contribution

B.

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FEC ID number of contributing
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C

Name of Employer
Self

Occupation
Attorney

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C

Name of Employer
Self

Occupation
Volunteer

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NAME OF COMMITTEE (in full)
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Mailing Address 6340 SW Hayward Blvd.

City Portland State OR Zip Code 97221

FEC ID number of contributing federal political committee.

C

Name of Employer
Self

Occupation
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C

Name of Employer
Retired

Occupation
Retired

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Full Name (Last, First, Middle Initial)
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FEC ID number of contributing federal political committee.

C

Name of Employer
Retired

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Retired

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